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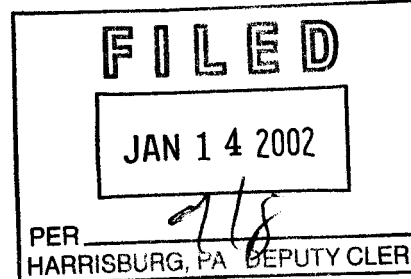
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1-15-02
SC

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JOAN D. TESCHÉ, : Civil Action No. 1:CV-01-03²6
:
Plaintiff :
v. :
:
CNA INSURANCE COMPANIES, and :
CONTINENTAL CASUALTY COMPANY, :
:
Defendants : (Judge Caldwell)



JOINT MOTION FOR EXTENSION OF
TIME TO FILE REPLY BRIEFS AND OTHER DOCUMENTS

1. On or about January 4, 2002, plaintiff's and defendants' undersigned counsel filed cross motions for summary judgment, together with briefs, statements of material facts, and other supporting documents.
2. The parties' reply briefs and other supporting and opposing documents must be filed on or about January 17, 2002.
3. The parties jointly request a 10-day extension of time in which to file reply briefs and other documents in support

of and in opposition to their pending summary judgment motions in that:

(a) this case will be decided on the pleadings, certain stipulated facts, deposition transcripts, cross motions for summary judgment, and related documents;

(b) the parties are in the process of exploring and exhausting settlement negotiations which would obviate the need for additional litigation and the resultant attorneys' fees and costs;

(c) if the case is not promptly settled, the parties need a modest extension of time to prepare and file reply briefs, responses to each party's statement of material facts, and related documents; and

(d) the requested extension would increase the chances of either a successful settlement or a prompt disposition by summary judgment.

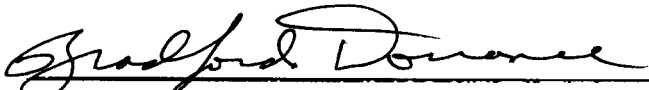
WHEREFORE, the parties' respective counsel respectfully request that the Court enter the order accompanying this motion and grant such other relief as it may deem appropriate.

Respectfully submitted,

KEEFER WOOD ALLEN & RAHAL, LLP

Dated: 1/14/02

By:



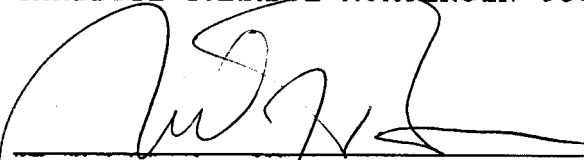
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(Attorneys for Plaintiff)

~~CHRISTIE PARABUE MORTENSEN YOUNG~~

Date: 1/11/02

By:



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(Attorneys for Defendants)

CERTIFICATE OF SERVICE

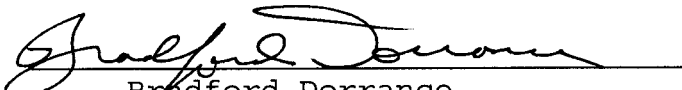
I hereby certify that I have this day served a copy of the foregoing document upon the person(s) and in the manner indicated below:

First-Class Mail, Postage Prepaid
Addressed as Follows:

Michael J. Burns, Esquire
CHRISTIE PARABUE MORTENSEN YOUNG
1880 JFK Boulevard
10th Floor
Philadelphia, PA 19103-7424

(Attorneys for Defendants)

Dated: 1/14/02


Bradford Dorrance